

Hearing Date: October 6, 2023 at 10:00 a.m. (Prevailing Eastern Time)
Objection Date: September 29, 2023 at 4:00 p.m. (Prevailing Eastern Time)

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*Counsel to the Foreign Representatives of
Three Arrows Capital, Ltd. (in liquidation)*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-10063 (SHL)
)
)
) Jointly Administered
)

**NOTICE OF HEARING ON MOTION FOR ENTRY OF AN ORDER PURSUANT TO
BANKRUPTCY RULE 2004 AUTHORIZING THE ISSUANCE OF SUBPOENAS
FOR THE PRODUCTION OF DOCUMENTS BY THE DEBTORS**

PLEASE TAKE NOTICE that Russell Crumpler and Christopher Farmer, in their capacities as the duly authorized joint liquidators and foreign representatives (the “**Foreign**

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

Representatives”) of Three Arrows Capital, Ltd., by and through their undersigned counsel, filed a motion (the “**2004 Motion**”) on September 15, 2023 (Docket No. 711), pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure for entry of an order substantially in the form attached to the 2004 Motion as **Exhibit A** authorizing the Foreign Representatives to issue subpoenas for the production of documents on Debtors Genesis Global Holdco, LLC, Genesis Global Capital, LLC, and Genesis Asia Pacific, Pte. Ltd., (collectively, the “**Debtors**”), and directing the Debtors to produce all documents within their custody, possession, or control regarding the issues and matters designated in the attached **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that a hearing on the 2004 Motion will be held via Zoom before the Honorable Judge Sean H. Lane, United States Bankruptcy Judge in the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”), 300 Quarropas Street, White Plains, NY 10601 on **October 6, 2023 at 10:00 a.m.** (Eastern Time).

PLEASE TAKE FURTHER NOTICE that any responses or objections, if any, to the 2004 Motion or the relief requested therein shall be made in writing and (a) filed with the Bankruptcy Court no later than **September 29, 2023 at 4:00 p.m.** (Eastern Time) (the “**Objection Deadline**”) and (b) served as required by the Order Implementing Certain Notice and Case Management Procedures, ECF No. 44.

PLEASE TAKE FURTHER NOTICE that if no written objections are timely filed and served with respect to the 2004 Motion, the Foreign Representatives may, on or after the Objection Deadline, submit to the Court an order substantially in the form attached to the 2004 Motion as **Exhibit A**, which order the Bankruptcy Court may enter without further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that copies of the 2004 Motion can be viewed and/or obtained by: (i) accessing the Court's website at www.nysb.uscourts.gov (PACER password required) or (ii) from the Debtors' proposed notice and claims agent, Kroll Restructuring Administration LLC, which maintains a website at <https://restructuring.ra.kroll.com/genesis> or by calling +1 888 524 2017.

PLEASE TAKE FURTHER NOTICE that the Hearing may affect your rights. Please read the 2004 Motion carefully and, if you have one available, discuss it with your attorney (if you do not have an attorney, you should consider consulting with one).

PLEASE TAKE FURTHER NOTICE that if you oppose the relief requested in the 2004 Motion, or if you want the Court to hear your position on the 2004 Motion, then you or your attorney must attend the Hearing. If you or your attorney do not follow the foregoing steps, the Court may decide that you do not oppose the relief requested in the 2004 Motion and may enter orders granting the relief requested by the Foreign Representatives.

Dated: September 21, 2023
Los Angeles, California

Respectfully submitted,

/s/ Nima H. Mohebbi

Nima H. Mohebbi (admitted *pro hac vice*)

Tiffany M. Ikeda (admitted *pro hac vice*)

Emily R. Orman (admitted *pro hac vice*)

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*Counsel to the Foreign Representatives
of Three Arrows Capital, Ltd.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 21, 2023, I caused true and correct copies of this notice of hearing as well as the 2004 Motion to be served upon those parties identified on: (i) the master service list attached hereto as **Exhibit A**; and (ii) the service list attached hereto as **Exhibit B**, in the manner specified therein.

/s/ Nima H. Mohebbi

Nima H. Mohebbi

Exhibit A

Master Service List

Served Via Email

In re: Genesis Global Holdco, LLC, et al.

Master Service List

Case No. 22-10063 (SHL)

DESCRIPTION	NAME	NOTICE NAME	ADDRESS 1	ADDRESS 2	CITY	STATE	ZIP	EMAIL
Counsel to Soichiro "Michael" Moro	Arnold & Porter Kaye Scholer LLP	Attn: Benjamin Mintz, Marcus Asner, Justin Imperato	250 West 55th Street		New York	NY	10019	benjamin.mintz@arnoldporter.com marcus.asner@arnoldporter.com justin.imperato@arnoldporter.com
Counsel to Donut, Inc.	ASK LLP	Attn: Edward E. Neiger, Marianna Udem	60 East 42nd Street, 46th Floor		New York	NY	10165	eneiger@askllp.com mudem@askllp.com
Counsel to Digital Finance Group Co.	Baird Holm LLP	Attn: Jeremy C. Hollembeak	1700 Farnam St. Ste. 1500		Omaha	NE	68102	jhollembeak@bairdholm.com
Counsel to the Fair Deal Group	Brown Rudnick LLP	Attn: Kenneth J. Aulet	Seven Times Square		New York	NY	10036	kaulet@brownrudnick.com
Counsel to the Fair Deal Group	Brown Rudnick LLP	Attn: Matthew A. Sawyer	One Financial Center		Boston	MA	02111	msawyer@brownrudnick.com
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Counsel to the Debtors	Cleary Gottlieb Steen & Hamilton LLP	Attn: Sean O'Neal, Jane VanLare, Hoo Ri Kim, Michael Weinberg, Richard C. Minott, Christian Ribeiro, Luke A. Barefoot, Andrew Weaver, Rishi Zutshi	One Liberty Plaza		New York	NY	10006	soneal@cgsh.com jvanlare@cgsh.com hokim@cgsh.com mdweinberg@cgsh.com rminott@cgsh.com cribeiro@cgsh.com lbarefoot@cgsh.com aweaver@cgsh.com rzutshi@cgsh.com
Debtors	Genesis Global Holdco, LLC	Attn: Derar Islim, Arianna Pretto-Sankman	250 Park Avenue South	5th Floor	New York	NY	10003	arianna@genesistrading.com
Counsel to Foundry Digital LLC	Horwood Marcus & Berk Chartered	Attn: Aaron L. Hammer, Nathan E. Delman	500 W. Madison St., Ste. 3700		Chicago	IL	60661	ahammer@hmbllaw.com ndelman@hmbllaw.com ecfnofices@hmbllaw.com
Counsel to Gemini Trust Company, LLC	Hughes Hubbard & Reed LLP	Attn: Anson B. Frelinghuysen, Dustin P. Smith, Jeffrey S. Margolin	One Battery Park Plaza		New York	NY	10004	anson.frelinghuysen@hugheshubbard.com dustin.smith@hugheshubbard.com jeff.margolin@hugheshubbard.com
IRS Insolvency Section	Internal Revenue Service	Centralized Insolvency Operation	2970 Market Street	Mail Stop 5 Q30 133	Philadelphia	PA	19104-5016	mimi.m.wong@irsounsel.treas.gov
IRS Insolvency Section	Internal Revenue Service	Centralized Insolvency Operation	P.O. Box 7346		Philadelphia	PA	19101-7346	mimi.m.wong@irsounsel.treas.gov
Bankruptcy Counsel to the Securities Litigation Lead Plaintiff	Kaplan Fox & Kilsheimer LLP	Attn: Jeffrey P. Campisi	800 Third Avenue, 38th Floor		New York	NY	10022	jcampisi@kaplanfox.com
Counsel to Ad Hoc Group of Creditors	Kirkland & Ellis LLP Kirkland & Ellis International LLP	Attn: Joshua A. Sussberg, Christopher Marcus, Ross J. Fiedler	601 Lexington Avenue		New York	NY	10022	joshua.sussberg@kirkland.com christopher.marcus@kirkland.com ross.fiedler@kirkland.com
Special Litigation Counsel to Debtors and Debtors-in-Possession	Kobre & Kim LLP	Attn: Danielle L. Rose, Daniel J. Saval, John G. Conte	800 Third Avenue		New York	NY	10022	Danielle.Rose@kobrekim.com Daniel.Saval@kobrekim.com John.Conte@kobrekim.com
Counsel to 250 Park LLC	Leech Tishman Robinson Brog, PLLC	Attn: Fred B. Ringel	875 Third Avenue, 9th Floor		New York	NY	10022	fringel@leechtishman.com
Bankruptcy Counsel to the Securities Litigation Lead Plaintiff	Lowenstein Sandler LLP	Attn: Michael S. Etkin, Andrew D. Behlmann, Michael Papandrea	One Lowenstein Drive		Roseland	NJ	07068	metkin@lowenstein.com abeblmann@lowenstein.com mpapandrea@lowenstein.com
Counsel to the New Jersey Bureau of Securities	McElroy, Deutsch, Mulvaney & Carpenter, LLP	Attn: Jeffrey Bernstein	570 Broad Street	Suite 1401	Newark	NJ	07102	jbernstein@mdmc-law.com
Counsel to the New Jersey Bureau of Securities	McElroy, Deutsch, Mulvaney & Carpenter, LLP	Attn: Nicole Leonard	225 Liberty Street	36th Floor	New York	NY	10281	nleonard@mdmc-law.com
Counsel to the New Jersey Bureau of Securities	McElroy, Deutsch, Mulvaney & Carpenter, LLP	Attn: Virginia T. Shea	1300 Mt. Kemble Avenue	P.O. Box 2075	Morristown	NJ	07962-2075	vshea@mdmc-law.com

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DESCRIPTION	NAME	NOTICE NAME	ADDRESS 1	ADDRESS 2	CITY	STATE	ZIP	EMAIL
Special Litigation and Enforcement Counsel to the Debtors	Morrison Cohen LLP	Attn: Heath D. Rosenblat, Jason P. Gottlieb	909 Third Avenue	27th Floor	New York	NY	10022	hrosenblat@morrisoncohen.com
Counsel to NYSOAG	New York State Office of the Attorney General	Attn: Gabriel Tapalaga	Investor Protection Bureau	28 Liberty St., 21st Floor	New York	NY	10005	gabriel.tapalaga@ag.ny.gov
Counsel to Mirana Corp.	Norton Rose Fulbright US LLP	Attn: Eric Daucher, Victoria V. Corder, Francisco Vazquez	1301 Avenue of the Americas		New York	NY	10019-6022	eric.daucher@nortonrosefulbright.com victoria.corder@nortonrosefulbright.com victoria.corder@nortonrosefulbright.com
Office of The United States Trustee – NY Office	Office of the US Trustee	Attn: Greg Zipes	Alexander Hamilton Custom House	One Bowling Green, Suite 515	New York	NY	10014	ustpregion02.nyecf@usdoj.gov andy.velez-rivera@usdoj.gov tara.tiantian@usdoj.gov greg.zipes@usdoj.gov
Counsel to Official Committee of Unsecured Creditors of FTX Trading Ltd., et al.	Paul Hastings LLP	Attn: Kristopher M. Hansen, Kenneth Pasquale, Isaac Sasson	200 Park Avenue		New York	NY	10166	krishansen@paulhastings.com kenpasquale@paulhastings.com isaacsasson@paulhastings.com
Counsel to Caramila Capital Management LLC and Residia Asset Management AG	Polsinelli PC	Attn: Christopher A. Ward	222 Delaware Avenue, Suite 1101		Wilmington	DE	19801	cward@polsinelli.com
Counsel to Caramila Capital Management LLC and Residia Asset Management AG	Polsinelli PC	Attn: Jeremy R. Johnson	600 Third Avenue, 42nd Floor		New York	NY	10016	jeremy.johnson@polsinelli.com
Counsel to Ad Hoc Group of Genesis Lenders	Proskauer Rose LLP	Attn: Brian S. Rosen, Vincent Indelicato, Megan R. Volin	Eleven Times Square		New York	NY	10036	brosen@proskauer.com vindelicato@proskauer.com mvolin@proskauer.com
Counsel to Ad Hoc Group of Genesis Lenders	Proskauer Rose LLP	Attn: Jordan E. Sazant	70 West Madison, Suite 3800		Chicago	IL	60602	jsazant@proskauer.com
Securities and Exchange Commission - Headquarters	Securities & Exchange Commission	Attn: Secretary Of The Treasury	100 F Street, NE		Washington	DC	20549	secbankruptcy@sec.gov nyrobankruptcy@sec.gov
Securities and Exchange Commission - Regional Office	Securities & Exchange Commission - NY Office	Attn: Bankruptcy Department	Brookfield Place	200 Vesey Street, Suite 400	New York	NY	10281-1022	bankruptcynoticeschr@sec.gov
Securities and Exchange Commission - Regional Office	Securities & Exchange Commission - Philadelphia Office	Attn: Bankruptcy Department	One Penn Center	1617 JFK Blvd, Ste 520	Philadelphia	PA	19103	secbankruptcy@sec.gov
Special Litigation Counsel to the Official Committee of Unsecured Creditors	Seward & Kissel LLP	Attn: John R. Ashmead, Mark D. Kotwick, Catherine V. LoTempio, Andrew J. Matott	One Battery Park Plaza		New York	NY	10004	ashmead@sewkis.com kotwick@sewkis.com lotempio@sewkis.com matott@sewkis.com
Bankruptcy Counsel to the Securities Litigation Lead Plaintiff	Silver Golub & Teitell LLP	Attn: Ian W. Sloss	One Landmark Square, 15th Floor		Stamford	CT	06901	isloss@sgtlaw.com
Counsel to FTX Trading Ltd.	Sullivan & Cromwell LLP	Attn: Andrew G. Dietderich, James L. Bromley, Brian D. Glueckstein, Alexa J. Kranzley, Christian P. Jensen	125 Broad Street		New York	NY	10004	dietdericha@sullcrom.com bromleyj@sullcrom.com gluecksteinb@sullcrom.com kranzleya@sullcrom.com jensenc@sullcrom.com
United States Attorney's Office for the Southern District of New York	U.S. Attorney for Southern District Of New York	Attn: Bankruptcy Division	86 Chambers Street	3rd Floor	New York	NY	10007	jeffrey.oestericher@usdoj.gov lawrence.fogelman@usdoj.gov peter.aronoff@usdoj.gov linda.riffkin@usdoj.gov
Counsel to Digital Currency Group, Inc.	Weil, Gotshal & Manges LLP	Attn: Jeffrey D. Saferstein, Ronit Berkovich, Jessica Liou, Furqaan Siddiqui	767 Fifth Avenue		New York	NY	10153	jeffrey.saferstein@weil.com ronit.berkovich@weil.com jessica.liou@weil.com furqaan.siddiqui@weil.com

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Counsel to Official Committee of Unsecured Creditors	White & Case LLP	Attn: Gregory F. Pesce	111 South Wacker Drive	Suite 5100	Chicago	IL	60606	gregory.pesce@whitecase.com
Counsel to Official Committee of Unsecured Creditors	White & Case LLP	Attn: J. Christopher Shore, Philip Abelson, Michele J. Meises	1221 Avenue of the Americas		New York	NY	10020	cshore@whitecase.com philip.abelson@whitecase.com michele.meises@whitecase.com
Counsel to Barry Habib	Windels Marx Lane & Mittendorf, LLP	Attn: James M. Sullivan	156 West 56th Street		New York	NY	10019	jsullivan@windelsmarx.com

Exhibit B

Honorable Judge Sean H. Lane
United States Bankruptcy Court for the Southern District of New York
300 Quarropas Street
White Plains, NY 10601 (Via Hand-Delivery)

Stuart P. Gelberg
Attorney for Vivian Farmery
Attn: Stuart P. Gelberg
125 Turkey Lane
Cold Spring Harbor, NY 11724 (Via U.S. Mail)

TN Dept of Revenue
Attn: TN Attorney General's Office
PO Box 20207
Nashville, TN 37202-0207